



May 11, 2007

1300 I Street, NW  
Suite 400 West  
Washington, DC 20005  
(202) 515-2534  
(202) 336-7922 (fax)

**Ex Parte**

Ms. Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, S.W.  
Washington, D.C. 20554

**Re: Implementation of the Telecommunications Act of 1996-Telecommunications Carriers' Use of Customer Proprietary Network Information and other Customer Information, CC Docket No. 96-115**

Dear Ms. Dortch:

Today, Joshua Swift, Jackie Ruff, and the undersigned of Verizon met with John Hunter of Commissioner McDowell's office. In a separate meeting, Joshua Swift and the undersigned met with Marcus Maher and Randy Clarke of the Wireline Competition Bureau. In these meetings, we discussed the company's concerns regarding potential restrictions the FCC is considering placing on the foreign storage of and access to CPNI generated in the United States. We explained that the record in this proceeding is stale and should be refreshed. The record was originally established in 1998, and the Commission last sought industry comment on the issue five years ago in 2002. The telecommunications market has changed dramatically during the last five years and is now much more of a global market. For example, Verizon is now a major global service provider that provides a full range of communications services in six continents to large multinational corporate customers. We also explained that a prohibition on either foreign storage of or access to U.S.-generated CPNI would hinder Verizon's ability to effectively meet its customers' needs, including those of multinational corporate customers.

Additionally, we discussed why a prohibition on foreign storage or access of CPNI would have important international trade policy implications. We explained that the United States has promoted the free flow of information across borders to enable U.S. businesses to enter and operate effectively in foreign markets.

Please do not hesitate to contact me if you have any questions about this matter.

Sincerely,

A handwritten signature in black ink that reads "Donna Epps".